

**Remarks****I. Response to Objections to the Claims:**

At page 2, item 1 of the Office Action, claim 25 is objected to as being dependent on claim 25. In response to the objection, claim 25 has been amended to depend from claim 24.

**II. Response to Rejections Under 35 USC Section 102:**

At page 2 of the Office Action, claims 1-6, 16-23, 32-39, and 41 are rejected under 35 USC 102(e) as being anticipated by Dubbels et al (United States patent number 6,222,634, hereinafter referred to as "Dubbels"). However, Dubbels does not disclose a method for printing objects that includes printing, "without invoking an application associated with the one or more documents", as recited in independent claim 1. Nor does Dubbels disclose an apparatus that includes a controller that invokes "an instance of the automated print function and prints a requested document, without requiring any additional input from the user", as recited in amended independent claim 18. Nor does Dubbels disclose a storage medium that, when executed, implements an automated print function that "prints the downloaded document on an accessible printing device without first displaying the document to the user or requiring any further user interaction", as recited in amended independent claim 32. Nor does Dubbels disclose a graphical user interface that includes an iconic selector that causes a "document to be printed without first displaying the document to the user, or requiring any further user interaction", as recited in amended independent claim 36. Nor does Dubbels disclose an iconic selector that includes a control portion that issues a command with the name/identifier and location information invoking a remote print function to print the associated document "without displaying the associated document to the user, or requiring any further user interaction", as recited in amended independent claim 41.

In Dubbels, an apparatus and method for printing related web pages is disclosed. In Dubbels, once the user selects the pages to be printed (such as by way of button 820), the print tool constructs a temporary web page that contains all the web pages the user selected. This temporary web page is then printed using the standard print function supplied with the browser. As disclosed a column 5, lines 38-40 of Dubbels, "A user presses the 'print button' on a web page that corresponds to print applet 310 to indicate that printing of the current page and its related pages is desired". Thus, *in order to print the related web pages the user must first be operating within the web browser that is used to display the HTML encoded content of the web page*. This teaching is in sharp contrast with the limitations of claim 1, in which printing is performed "without invoking an application associated with the one or more documents".

Additionally, at column 6, lines 40-52, Dubbels discloses the removal of various HTML tags so that a conglomerate web page can be displayed to the user. At lines 48-49, Dubbels specifically discloses that "This conglomerate web page is then passed to the web client and *displayed* to the user (step 470)". This display of the conglomerate web page to the user is contrasted with the limitations of claim 32, which includes a storage medium that, when the instructions thereon are executed, implements an automated print function that "prints the downloaded document on an accessible printing device *without first displaying* the document to the user or requiring any further user interaction". (Italics added)

The display of the conglomerate web page to the user is also contrasted with the graphical user interface of claim 36 that includes an iconic selector that causes a "document to be printed *without first displaying* the document to the user", as recited in amended independent claim 36. The display of the conglomerate web page to the user is also contrasted with the graphical user interface of claim 41 in which an iconic selector in which "the control portion issues a command with the name/identifier and location information invoking a remote print function to print the associated document *without displaying* the associated document to the user, or requiring any further user interaction". [Italics added]

Dubbels also discloses, in Figure 8, button 820 that allows the user to print the selected related web pages. Thus, *Dubbels requires further user interaction in order to initiate the printing function*. This is also in contrast with the limitations of claims 18, 32, 36, and 41 in which documents are printed "without requiring any additional input from the user" (claim language may vary slightly).

Accordingly, the Applicants request that the Examiner withdraw the rejections under 35 USC 102.

### III. Response to Rejections Under 35 USC Section 103:

#### **Response to 103(a) Rejection of Dubbels in view of Herz:**

At page 8, item 23 of the Office Action, claims 7-8 are rejected under 35 USC 103(a) as being unpatentable over Dubbels in view of Herz (United States patent number 6,460,036, hereinafter referred to as "Herz"). At item 26, claims 11-13 are rejected as being unpatentable over Dubbels in view of Herz. At item 30, claims 24-26 are rejected as being unpatentable over Dubbels in view of Herz. At item 34, claim 29 is rejected as being unpatentable over Dubbels in view of Herz. At item 36, claim 42 is rejected as being unpatentable over Dubbels in view of Herz.

The Applicants respectfully traverse these rejections since the cited references, taken either singly or in combination therewith, do not disclose the Applicants' claimed invention (traverse 1). The Applicants further traverse the rejection because the Dubbels reference teaches away from the Herz reference (traverse 2).

Traverse (1): As mentioned in the Response to Rejections under 35 USC Section 102 (herein), Dubbels describes an apparatus and method for printing related web pages. However, as disclosed at column 5, lines 38-40 of Dubbels, "A user presses the 'print button' on a web page that corresponds to print applet 310 to indicate that printing of the current page and its related pages is desired". Thus, *in order to print the related web pages, a user must be operating within the web browser that is used to display the HTML coded content of the web page*. This teaching is in sharp contrast with the limitations of claim 1, in which printing is

performed "without invoking an application associated with the one or more documents". Further, in Figure 8, button 820 is shown that permits the user to print the selected related web pages. Thus, *Dubbels requires further user interaction in order to initiate the printing function*. This is in contrast with the limitations of claims 18, and 41 in which documents are printed "without requiring any additional input from the user" (claim language may vary slightly).

In Herz, a system and method for providing customized electronic newspapers and target advertisements is disclosed. Herz discloses a system that automatically constructs both a "target profile" for each target object in the electronic media based, for example, on the frequency with which each word appears in an article relative to its overall frequency of use in all articles, as well as a "target profile interest summary" for each user that describes the user's interest level in various types of target objects. However, Herz does not disclose, suggest, or mention the limitations of claim 1, in which printing is performed "without invoking an application associated with the one or more documents". Further, in Figure 8, button 820 is shown that permits the user to print the selected related web pages. Thus, *Dubbels requires further user interaction in order to initiate the printing function*. This is in contrast with the limitations of claims 18 and 41 in which documents are printed "without requiring any additional input from the user" (claim language may vary slightly).

Since the limitation of the Applicants' claims are not taught by either the *Dubbels* or the *Herz* reference, it would be improper to assert that when these references are combined, the resulting combination somehow teaches the missing limitation of printing "without invoking an application associated with the one or more documents" recited in claim 1, or the limitation of printing "without requiring any additional input from the user" as recited in claims 18 and 41.

Traverse (2): The *Dubbels* reference teaches away from the *Herz* reference. A central theme of the *Dubbels* reference seems to be the ability to print "related" web pages. At column 6, lines 13-16, *Dubbels* asserts that "A *preferred* criteria for relating web pages determines that web pages that have the same base address as part of their URL are related, while pages with different base addresses are not. (Italics added). *Dubbels* includes no disclosure that would encompass web pages

being "related" by way of any other criteria. The Applicants assert that Dubbels clearly defines and clearly teaches what is meant by a "related" web page.

In Herz, web pages are selected for printing based on a user profile. In Herz, pages are related for reasons other than being on the same server, or having the same base address, as disclosed by Dubbels.

Since Dubbels and Herz include two very different interpretations of what is meant by a "related" page, the Applicants assert that the two disclosures teach away from each other. As Dubbels clearly identifies that "related" web pages are pages that exist on the same server, or have the same base URL address, Dubbels does not leave room for pages to be related in another manner. Thus, Dubbels excludes the use of a profile to establish that two web pages might be related, as taught by Herz.

#### **Response to 103(a) Rejection of Dubbels in view of Logan:**

At page 9, item 25 of the Office Action, claims 9-10 are rejected under 35 USC 103(a) as being unpatentable over Dubbels in view of Logan (United States patent number 5,721,827, hereinafter referred to as "Logan"). At item 33, claims 27-28 are rejected as being unpatentable over Dubbels in view of Logan. The Applicants respectfully traverse these rejections since the cited references, taken either singly or in combination therewith, do not disclose the Applicants' claimed invention (traverse 1). The Applicants further traverse the rejection because the Dubbels reference teaches away from the Herz reference (traverse 2).

Traverse (1): As mentioned in the Response to Rejections under 35 USC Section 102 (herein), Dubbels describes an apparatus and method for printing related web pages. However, as disclosed at column 5, lines 38-40 of Dubbels, "A user presses the 'print button' on a web page that corresponds to print applet 310 to indicate that printing of the current page and its related pages is desired". Thus, *in order to print the related web pages, a user must be operating within the web browser that is used to display the HTML encoded content of the web page*. This teaching is in sharp contrast with the limitations of claims 1 and 18, in which printing

is performed "without displaying the one or more documents to the user" [claim language may vary slightly].

In Logan, a System for electrically distributing personalized information is disclosed. In Logan, a host organizes the program segments by subject matter and creates scheduled programming in accordance with preferences associated with each subscriber. However, Logan does not disclose, suggest, or mention the limitations of claim 1 or claim 18, in which printing is performed "without requiring any additional input from the user" (claim language may vary slightly).

Since the limitations of the Applicants claims are not taught by either the Dubbels or the Logan reference, it would be improper to assert that when these references are combined, the resulting combination somehow teaches the missing limitation of printing "without requiring any additional input from the user" as recited in claims 1 and 18.

Traverse (2): The Dubbels reference teaches away from the Logan reference. A central theme of the Dubbels reference seems to be the ability to print "related" web pages. At column 6, lines 13-16, Dubbels asserts that "A *preferred* criteria for relating web pages determines that web pages that have the same base address as part of their URL are related, while pages with different base addresses are not. [Italics added]. Dubbels includes no disclosure that would encompass web pages being "related" by way of any other criteria. The Applicants assert that Dubbels clearly defines and clearly teaches what is meant by a "related" web page.

In Logan, an audio selected for printing based on user preferences. In Logan, program segments are selected and delivered to the subscriber "based on that subscriber's characteristics, subject matter preferences and interests, and express requests" (see column 1, lines 46 and 47).

Since Dubbels and Logan include two very different criteria for selecting the material to be delivered to or printed by the recipient, the Applicants assert that the two disclosures teach away from each other. As Dubbels clearly identifies that "related" web pages are pages that exist on the same server, or have the same base URL address, Dubbels does not leave room for pages to be related in another manner. Thus, Dubbels excludes the use of a subscriber's characteristics, subject

matter preferences and interests, and express requests to determine the material to be delivered to the subscriber.

**Response to 103(a) Rejection of Dubbels in view of Logan and further in view of Yoda:**

At item 35, claim 30 is rejected under 35 USC 103(a) as being unpatentable over Dubbels in view of Logan and further in view Yoda (United States patent number 5,518,268, hereinafter referred to as "Yoda"). The applicants assert that this rejection is improper for the same reasons that the Dubbels and Logan rejection is improper.

Regarding Yoda more specifically, Yoda discloses a method of ordering products that are customized for a particular individual based on that individual's measurements. However, Yoda does not disclose the invention of claim 18, which includes printing "without requiring any additional input from the user". Further, since this limitation is missing from the three references, it would be improper to assert that when these references are combined, the resulting combination somehow teaches the missing limitation of printing "without requiring any additional input from the user" as recited in claims 1 and 18.

**Response to 103(a) Rejection of Dubbels in view of Griebenow:**

At page 14, item 37 of the Office Action, claims 15, 31, and 40 are rejected under 35 USC 103(a) as being unpatentable over Dubbels in view of Griebenow *et al.* (United States patent number 5,850,520, hereinafter referred to as "Griebenow"). The Applicants respectfully traverse these rejections since the cited references, taken either singly or in combination therewith, do not disclose the Applicants' claimed invention (traverse 1). The Applicants further traverse the rejection because the Dubbels reference teaches away from the Griebenow reference (traverse 2).

Traverse (1): As mentioned in the Response to Rejections under 35 USC Section 102 (herein), Dubbels describes an apparatus and method for printing related web pages. However, as disclosed a column 5, lines 38-40 of Dubbels, "A

user presses the 'print button' on a web page that corresponds to print applet 310 to indicate that printing of the current page and its related pages is desired". Thus, *in order to print the related web pages, a user must be operating within the web browser that is used to display the HTML encoded content of the web page*. This teaching is in sharp contrast with the limitation of claim 1, in which printing is performed "without invoking an application associated with the one or more documents". Additionally, the 'print button' teaching of Dubbels is also in contrast with the limitation of claim 18, in which printing is performed "without requiring any additional input from the user", and in contrast to printing without "requiring any further user interaction" as recited in claim 36.

In Griebenow, a customized electronic publication is delivered to a customer. However, However, Griebenow does not disclose, suggest, or mention the limitations of claim 1, in which printing is performed "without invoking an application associated with the one or more documents". Nor does Griebenow disclose the limitation of claims 18 and 36, in which printing is performed "without requiring any additional input from the user" (claim language may vary slightly).

Since the limitation of the Applicants claims are not taught by either the Dubbels or the Griebenow reference, it would be improper to assert that when these references are combined, the resulting combination somehow suggests or mentions the missing limitation of claim 1, in which printing is performed "without invoking an application associated with the one or more documents" or the limitation of claims 18 and 36, in which printing is performed "without requiring any additional input from the user" (claim language may vary slightly).

Traverse (2): The Dubbels reference teaches away from the Griebenow reference. A central theme of the Dubbels reference seems to be the ability to print related web pages. At column 6, lines 13-16, Dubbels asserts that "*A preferred* criteria for relating web pages determines that web pages that have the same base address as part of their URL are related, while pages with different base addresses are not. [*Italics added*]. Dubbels includes no disclosure that would encompass web pages being "related" by way of any other criteria. The Applicants assert that Dubbels clearly defines and clearly teaches what is meant by a "related" web page.

In Griebenow, a customized publication is delivered to a customer. In Griebenow this customization includes information supplied by the customer, such as age, marital status etc (see column 7, lines 25-36).

Since Dubbels and Griebenow include two very different criteria for selecting the material to be delivered to or printed by the recipient, the Applicants assert that the two disclosures teach away from each other. As Dubbels clearly identifies that "related" web pages are pages that exist on the same server, or have the same base URL address, Dubbels does not leave room for pages to be related in another manner. Thus, Dubbels excludes the use of customer characteristics such as age, marital status, and the like.

**Response to 103(a) Rejection of Dubbels:**

At item 29, claim 14 is rejected in view of Dubbels. The applicants respectfully traverse the rejection since Dubbels teaches away from the invention of claim 1 since (as previously mentioned in regards to Dubbels *in order to print the related web pages the user must first be operating within the web browser that is used to display the HTML encoded content of the web page*. This teaches away from the limitations of claim 1, in which printing is performed "without invoking an application associated with the one or more documents".


Accordingly, the Applicants believe that the rejection to the claims under 35 USC section 103 has been overcome.

**IV. Additional Fees:**

It is not believed that additional fees are due at this time; however, if any additional fee is required in connection with the filing of this Amendment, please charge the fee to Deposit Account No. 08-2025.

Respectfully Submitted,

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